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*The Barajas Group*

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

TRUSTEES OF THE OPERATING  
ENGINEERS PENSION TRUST;  
TRUSTEES OF THE OPERATING  
ENGINEERS HEALTH AND WELFARE  
FUND; TRUSTEES OF THE OPERATING  
ENGINEERS JOURNEYMAN AND  
APPRENTICE TRAINING TRUST; AND  
TRUSTEES OF THE OPERATING  
ENGINEERS VACATION HOLIDAY  
SAVINGS TRUST.

Plaintiffs,

vs.

THE BARAJAS GROUP, a Nevada  
Corporation,

Defendant.

Case No.: 2:24-cv-01410-APG-NJK

**STIPULATION OF DISMISSAL**

**IT IS HEREBY STIPULATED AND AGREED**, by and between Plaintiffs, Trustees Of  
The Operating Engineers Pension Trust; Trustees Of The Operating Engineers Health And Welfare  
Fund; Trustees Of The Operating Engineers Journeyman And Apprentice Training Trust; And  
Trustees Of The Operating Engineers Vacation Holiday Savings Trust and Defendant, The Barajas

1 Group, through their undersigned counsel that the above-captioned action is hereby dismissed with  
2 prejudice, without cost to any party as against the other, pursuant to Rule 41(a)(1)(A)(ii) of the  
3 Federal Rules of Civil Procedure.

4 **IT IS FURTHER STIPULATED AND AGREED** that this Court will retain jurisdiction  
5 for purposes of enforcing the Parties' executed Settlement Agreement, entered into on April 17,  
6 2025.

7 **IT IS FURTHER STIPULATED AND AGREED** that this Stipulation may be executed  
8 in facsimile and/or electronically scanned counterparts and may be filed without further notice with  
9 the Clerk of Court.

11 Dated: Las Vegas Nevada  
12 April 25, 2025

Dated: Cleveland, Ohio  
April 25, 2025

13 **THE URBAN LAW FIRM**  
14 **CHRISTENSEN, JAMES & MARTIN,**  
**CHTD.**

15 By: /s/ Michael A. Urban  
16 Michael A. Urban, Esq.  
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22 Attorney for Plaintiffs

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By: /s/ David M. Pixley  
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Attorneys for Defendant, The Barajas Group

25 IT IS SO ORDERED:

26 Dated: April 29, 2025

27 

28 ANDREW P. GORDON  
CHIEF UNITED STATES DISTRICT JUDGE